

KING & SPALDING LLP
1185 Avenue of the Americas
New York, New York 10036
Telephone: (212) 556-2100
Facsimile: (212) 556-2222
Arthur Steinberg
Scott Davidson

Attorneys for General Motors LLC

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	
In re	: Chapter 11
	:
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	: Case No.: 09-50026 (MG)
f/k/a General Motors Corp., <i>et al.</i>	:
	:
Debtors.	: (Jointly Administered)
-----X	

**NOTICE OF FILING PROPOSED STIPULATION AND ORDER RESOLVING
MOTION OF GENERAL MOTORS LLC TO ENFORCE THE BANKRUPTCY
COURT'S JULY 5, 2009 SALE ORDER AND INJUNCTION [ECF No. 13584]**

(PILGRIM PUTATIVE CLASS ACTION)

PLEASE TAKE NOTICE that on January 19, 2016, General Motors LLC ("**New GM**") filed the *Motion Of General Motors LLC Pursuant To 11 U.S.C. §§ 105 And 363 To Enforce The Bankruptcy Court's July 5, 2009 Sale Order And Injunction, And The Bankruptcy Court's Rulings In Connection Therewith (Pilgrim Putative Class Action)*, dated January 19, 2016 [ECF No. 13584] ("**Pilgrim Motion to Enforce**").

PLEASE TAKE FURTHER NOTICE that the parties to the Pilgrim Motion to Enforce have resolved the issues raised therein pursuant to the terms of a *Stipulation And Order Resolving Motion Of General Motors LLC To Enforce The Bankruptcy Court's July 5, 2009 Sale Order And Injunction [Ecf No. 13584]* ("**Proposed Pilgrim Stipulation and Order**").

PLEASE TAKE FURTHER NOTICE that New GM hereby files the Proposed Pilgrim Stipulation and Order, attached to this notice as **Exhibit "1."**

Dated: New York, New York
June 5, 2019

Respectfully submitted,

/s/ Scott I. Davidson

Arthur Steinberg

Scott Davidson

KING & SPALDING LLP

1185 Avenue of the Americas

New York, New York 10036

Telephone: (212) 556-2100

Facsimile: (212) 556-2222

Attorneys for General Motors LLC